

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

OLYMPIA HOTEL MANAGEMENT, LLC,
a Delaware limited liability company,

Plaintiff,

v.

THE BEND HOTEL DEVELOPMENT
COMPANY, LLC, an Illinois limited liability
company,

Defendant.

Civil Action No. 2:20-cv-136-NT

DECLARATION OF CHRISTINE CHAPIN

I, Christine Chapin, hereby declare under oath as follows:

1. I am the Senior Director of Sales for Hotel Management for Olympia Hotel Management, LLC (“Olympia”), the Plaintiff in this action. I have held this position since May 2008.

2. I live and work in Maine, and did so at all times relevant to this dispute.

3. Olympia sometimes receives calls from investors or project managers that are considering retaining Olympia to manage their hotel. As Senior Director of Sales for Hotel Management, those calls are often directed to me.

4. In the fall of 2013, Olympia received a call from J. Paul Beitler. The call was directed to me. Mr. Beitler identified himself as the developer of a hotel in East Moline, Illinois. Mr. Beitler stated that he was working on behalf of an entity called Great River.

5. Mr. Beitler told me that he was contacting Olympia because Hyatt, the national brand with which Great River sought to affiliate its hotel, recommended that Great River consider hiring Olympia to manage its hotel.

6. Before receiving Mr. Beitler's call, Olympia had not been in contact with Great River or anyone associated with it, nor heard of the hotel project in East Moline, Illinois.

7. Mr. Beitler's call to Olympia kicked off months of negotiation between Olympia and Great River, which culminated in the Hotel Management Agreements ("HMAs") at issue in this lawsuit.

8. Under the HMAs, I provided a number of sales-related services to the Hotel between the months leading up to the Hotel's opening in December 2018 and the termination of the HMAs.

9. From Maine, I assisted the on-site Director of Sales for the Hotel with marketing, account solicitation, prospecting potential clients, and other sales activities. I provided these services on a weekly basis.

I declare under the penalties of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 17, 2020

/s/ Christine Chapin

Christine Chapin

CERTIFICATE OF SERVICE

I hereby certify that on the date indicated below I caused a copy of the foregoing pleading to be filed with the Court's ECF filing system, which will cause an electronic notice to be sent to counsel of record.

Dated: June 19, 2020

/s/ Kyle M. Noonan

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